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November 17, 2014

**BY ECF**

Honorable J. Paul Oetken  
United States District Judge  
United States District Court  
40 Foley Square  
New York, NY 10007

Re: *Human Rights Watch v. Dep't of Justice Fed. Bureau of Prisons*, 13 Civ. 7360 (HB)

Dear Judge Oetken:

The parties to the above-referenced Freedom of Information Act ("FOIA") litigation submit this joint letter to inform the Court about the status of the case and to propose a schedule for summary judgment briefing, as permitted by the joint stipulation ordered by the Court on May 9, 2014. *See* ECF No. 19, ¶ 10(e); *see also* ECF No. 24.

Consistent with the terms of the May 9 Order, on November 3, 2014, Defendant Federal Bureau of Prisons ("BOP") provided Plaintiff Human Rights Watch ("HRW") with draft *Vaughn* indices describing information withheld or redacted from all of the records produced by BOP in response to the FOIA requests at issue in this litigation. *See* ECF No. 19, ¶ 10(e). On November 13, 2014, the parties met and conferred by telephone to discuss the draft *Vaughn* indices in order to attempt to narrow disagreements about the BOP's withholdings and redactions. *Id.* While the parties continue to discuss certain points that may be resolved by mutual consent, the parties both agree that several issues will not be resolved by agreement and will instead require resolution by this Court.

The parties therefore propose the following briefing schedule for cross-motions for summary judgment:

1. The Government's motion for summary judgment shall be due by January 23, 2015.
2. Plaintiff's opposition and cross-motion shall be due by February 23, 2015.
3. The Government's reply and opposition to the cross-motion shall be due by March 25, 2015.
4. The Plaintiff's reply in support of the cross-motion shall be due by May 10, 2015.

The parties respectfully ask the Court to so-order this briefing schedule, and thank the Court for its consideration of this matter.

Respectfully submitted,

*Counsel for the Defendant*

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